

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
1285 AVENUE OF THE AMERICAS  
TELEPHONE (212) 373-3000

NEW YORK, NEW YORK 10019-6064

WRITER'S DIRECT DIAL NUMBER

(212) 373-3553

WRITER'S DIRECT FACSIMILE

(212) 492-0553

WRITER'S DIRECT E-MAIL ADDRESS

[sbuergel@paulweiss.com](mailto:sbuergel@paulweiss.com)

UNIT 5201, FORTUNE FINANCIAL CENTER  
5 DONGSANHUAN ZHONGLU  
CHAOYANG DISTRICT, BEIJING 100020, CHINA  
TELEPHONE (86-10) 5828-6300

HONG KONG CLUB BUILDING, 12TH FLOOR  
3A CHATER ROAD, CENTRAL  
HONG KONG  
TELEPHONE (852) 2846-0300

ALDER CASTLE  
10 NOBLE STREET  
LONDON EC2V 7JU, UNITED KINGDOM  
TELEPHONE (44 20) 7357 1600

FUKOKU SEIMEI BUILDING  
2-2 UCHISAIWAICHO 2-CHOME  
CHIYODA-KU, TOKYO 100-0011, JAPAN  
TELEPHONE (81-3) 3597-8101

TORONTO-DOMINION CENTRE  
77 KING STREET WEST, SUITE 3100  
PO BOX 226  
TORONTO, ONTARIO M5K 1J3  
TELEPHONE (416) 504-0520

2001 K STREET, NW  
WASHINGTON, DC 20006-1047  
TELEPHONE (202) 223-7300

500 DELAWARE AVENUE, SUITE 200  
POST OFFICE BOX 32  
WILMINGTON, DE 19899-0032  
TELEPHONE (302) 655-4410

November 9, 2020

**By ECF**

The Honorable Gregory H. Woods  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, NY 10007

*Cardwell v. Davis Polk & Wardwell LLP, et al.*  
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

Further to the November 4, 2020 pre-motion conference in the above-captioned matter, Defendants respectfully enclose copies of the Joint Letter and exhibits filed September 29, 2020 (ECF 75) bearing redactions reflecting the Court's November 4 Order (ECF 82).

Plaintiff disputes that the redactions are consistent with the Court's November 4 Order. Specifically, Plaintiff disagrees that page 3 of Exhibit A is narrowly tailored, or that the redactions on pages four and five are covered by attorney-client privilege. Thus, Plaintiff has added a footnote on pages four and five indicating a reservation of rights to use non-attorney-client privileged documents according to applicable rules and to challenge any similarly impermissible redactions in the future.

Respectfully submitted,

/s/ Susanna M. Buergel

Susanna M. Buergel

Attachments

cc: All Counsel of Record (via ECF)